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AZ CORP COMMISSION
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August 25, 2000

Jerry L. Rudibaugh, Esq.
Chief Administrative Law Judge
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Re: AEPCO, Duncan and Graham's Comments on Proposed Rule
Revisions in Docket NO. RE-00000C-00-0275

Dear Mr. Rudibaugh:

Pursuant to your July 26, 2000 Procedural Order, these are the Comments of AEPCO, Duncan and Graham (the "Cooperatives") on the Proposed Rule Revisions attached to Decision No. 62748.

1609.E. AEPCO, TEP and APS already filed earlier this summer the AISA implementation plan and its protocols. To clarify that they need not be filed again, add "If not previously filed," at the beginning of this Section.

1612.L.9. For safety, liability, reliability and proficiency reasons, the Cooperatives suggest this provision be re-written as follows: "Maintenance and servicing of the metering equipment (including Current Transformers and Potential Transformers) may be performed by the Affected Utility, Utility Distribution Company or the Electric Service Provider for secondary voltage services under 600 volts, but only by the Affected Utility or Utility Distribution Company for distribution primary voltage services."

1612.L.10. For the same reasons, revise this provision as follows: "Distribution primary voltage Current Transformers and Potential Transformers may be owned by the Affected Utility or Utility Distribution Company only."

1606 and 1612. Transmission service is a noncompetitive service (R14-2-1601.29). Yet, in these two rules it is included in competitive service classifications. To correct this inconsistency, the Cooperatives suggest the following:

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- 1606.C.2.a. Delete "iv. Transmission services;" and renumber remaining items.
- 1606.C.2.b. Add "ii. Transmission Services;" and renumber remaining items.
- 1612.0.1. Delete "c. Transmission and Ancillary Services;" and re-letter remaining items.
- 1612.0.2. Add "b. Transmission Services;" and re-letter remaining items.

1616.A. Codes of Conduct have already been filed by several utilities including the Cooperatives, so add "If not previously filed," at the beginning of the first sentence of this Section.

The Commission has indicated that it intends to limit these revisions to "minor clarifications of the rules..." Finding of Fact No. 2, Decision No. 62748. For this reason, the Cooperatives have restricted these comments accordingly but do so without waiver of their positions on more substantive policy provisions of the Rules previously raised including, without limitation, the issues raised in their Applications for Rehearing of Decision No. 61969 dated October 19, 1999.

Very truly yours,

GALLAGHER & KENNEDY, P.A.



By:
Michael M. Grant

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